

O'ROURKE & ASSOCIATES, LLC

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Attorneys for Benjamin Roberts-Creditor/Defendant

Hearing Date and Time:

July 2, 2014 at 10:00 am

ORAL ARGUMENT

REQUESTED

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE TRIPLANET PARTNERS, LLC,

Chapter 11

Debtor.

Case No. 14-22643 (RDD)

-----X

**NOTICE OF MOTION TO DISMISS CHAPTER 11 CASE OR,
ALTERNATIVELY, FOR RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that, upon the Motion to Dismiss Chapter 11 Case or, Alternatively, for Relief from the Automatic Stay, filed herewith, along with the Declaration of Brendan J. O'Rourke, Esq., dated June 5, 2014, Creditor Benjamin Roberts ("Roberts"), by and through his undersigned counsel, will move this Court, at a hearing to be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, Southern District of New York, located at 300 Quarropas Street, White Plains, New York, 10601, on **July 2, 2014, at 10:00 in the forenoon**, or as soon thereafter as counsel may be heard, for entry of an order, pursuant to 11 U.S.C. § 1112, and Federal Rules of Bankruptcy Procedure Rules 1017(b) and 9014, dismissing the Chapter 11 Case filed by the Debtor, TriPlanet Partners, LLC, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in this Motion to Dismiss must be in writing, pursuant to Local Rule 9006-1(b), must be filed with the Clerk of Court, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York, 10601, with a courtesy copy to Chambers, and served upon all counsel of record, via the Electronic Case Filing system, or upon all unrepresented parties, no later than seven (7) days prior to the date of the hearing.

Dated: New Canaan, CT
June 6, 2014

Respectfully submitted,

O'ROURKE & ASSOCIATES, LLC



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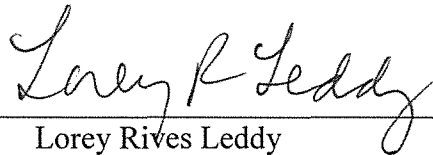
CERTIFICATION

This is to certify that, on June 6, 2014, a copy of the foregoing was filed electronically and served by e-mail and regular mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all persons and counsel of record, as listed below, by operation of the Court's electronic filing system, or by e-mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing.

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